

U.S District Court
District OF Alaska

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**CLERK, U.S. DISTRICT COURT
ANCHORAGE, A.K.**

Case # 3:05-cv-00283

7/30/2007

Lewis Deans

VS

Anchorage School District Et. Al

Motion To Enforce 1415(e)(3) Stay Put Provision under IDEA 1400.

I motion the court by its power of Federal Jurisdiction to enforce 1415(e)(3) stay put provision under IDEA 1400 Supreme Court Law and Congressional Mandate.

- 1. I won the case due to Verification of summary judgment not being answered in a timely manner to specificity. As you know the rule of law requires them to answer each and every statement. Since it has not been answered, by law with trained attorneys I've won by default and can take this matter to a higher appellate court. I am willing to exercise my right to do so.**
- 2. Dismissal is Unconstitutional and it Denies Habeas Corpus**
- 3. All frivolous reasons given by the court do not usurp the supreme law of Stay Put or IDEA.**
- 4. Administrative remedies have nothing to do with the automatic injunction of Stay Put and should not be contingent on other frivolous circumstances. The courts job is to merely enforce the automatic stay put injunction nothing more and nothing less.**
- 5. Therefore to dismiss without prejudice without enforcement is UNCONSTITUTIONAL.**



Lewis Deans

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